

### REMARKS

In response to the Office Action mailed December 26, 2008, the Applicant submits this Reply. In view of the foregoing amendments and following remarks, reconsideration is requested. After entry of the foregoing amendments, claims 1-20 remain in this application, of which claims 1 and 11 are independent. In the Office Action, all of the claims were rejected. These rejections are overcome by the foregoing amendments and the following arguments.

### Examiner Interview Summary

The Applicant thanks Examiner Orr and Examiner Hutton for the Examiner Interview conducted on February 25, 2009. The Applicant requested the interview to clarify certain aspects of the most recent Office Action. Examiners Orr and Hutton directed the Applicant to page 10 of the Final Office Action, in particular that: "claims 1 and 11 do not necessitate a different operation to occur on each of the icons while being moved across the display screen" and "[b]ased on the language of the claims, it is not necessary to combine the references in the way suggested by the Applicant (i.e. a further select, drag and drop, during a drag and drop operation already being performed) in order to meet the claim invention. IBM Drag can drag and drop the attached objects. Then after the dropping as taught by IBM Drag, IBM Multi-icon teaches entering a dropping mode with the dropped collection of attached objects.<sup>1</sup>

---

<sup>1</sup> Final Office Action dated November 26, 2009, page 10, first paragraph.

Rejections under 35 U.S.C. § 103

The Office Action rejected claims 1, 3-11, and 13-20 under 35 U.S.C. § 103(a) as being unpatentable over IBM TDB, "Visual for Multiple-Icon Drag Movement" (hereinafter "IBM Drag"), original publication September 1, 1994 in view of IBM TOB, "Adding and Removing Icons from a Multi-Icon" (hereinafter "IBM Multi-Icon"), original publication March 1, 1993 of record.

As amended, the Applicant's claim 1 recites, *inter alia*, "entering a dropping mode while the at least two objects are attached to the cursor" and "**while in the dropping mode . . .** performing steps . . . for each object to be dropped, so that each of said at least two objects can be sequentially dropped at unique locations independently of other objects in said list of attached objects."<sup>2</sup> No combination of IBM Drag and IBM Multi-Icon either describes or renders obvious at least these limitations of claim 1.

In contrast, IBM Drag describes "a method for displaying a number of icons selected by the user of a system as the icons are moved across the display screen."<sup>3</sup> That is, a user "selects a group of object icons" and drags the selected objects across the screen "in a stacked formation moving with the mouse pointer with the object chosen . . . at the top of the stack."<sup>4</sup>

As amended, claim 1 recites entering a dropping mode while the at least two objects are attached to the cursor, and that a number of steps related to sequentially dropping objects at unique locations are performed while in the dropping mode. On the other hand, IBM Drag describes entering a dragging mode, with selected objects acquiring "selected emphasis."<sup>5</sup> More

---

<sup>2</sup> Emphasis added.

<sup>3</sup> IBM Drag, p. 417, first paragraph

<sup>4</sup> IBM Drag, p. 417-18.

<sup>5</sup> IBM Drag, p. 417, second paragraph.

simply put, objects are dragged in the dragging mode and “when the user releases mouse button 2”<sup>6</sup> the objects are dropped at a location, thereby exiting the dragging mode. Thus, IBM neither describes nor makes obvious “entering a dropping mode while the at least two objects are attached to the cursor” and “while in the dropping mode . . . performing steps . . . for each object to be dropped, so that each of said at least two objects can be sequentially dropped at unique locations independently of other objects in said list of attached objects.”

IBM Multi-Icon does not remedy the foregoing deficiencies of IBM Drag. Instead, IBM Multi-Icon describes a “multi-icon” which “represents two or more icons of the same type.”<sup>7</sup> When a user selects a multi-icon, “the user will get a list of the icons that the multi-icon represents.”<sup>8</sup> Given this list, “the user can choose one of the icon entries.”<sup>9</sup> “[T]he user can drag an entry off of the application icon list . . . and drop it on the desktop.”<sup>10</sup>

IBM Multi-Icon fails to describe or make obvious “entering a dropping mode while the at least two objects are attached to the cursor” and “while in the dropping mode . . . performing steps . . . for each object to be dropped, so that each of said at least two objects can be sequentially dropped at unique locations independently of other objects in said list of attached objects” as required by the Applicant’s claim 1. While IBM Multi-Icon does disclose that a “user can drag an entry off of the application icon list . . . and drop it on the desktop,” IBM Multi-Icon is silent with regard to performing similar steps while in a dropping mode.

---

<sup>6</sup> IBM Drag, p. 418, least paragraph.

<sup>7</sup> IBM Multi-Icon, p. 401, first paragraph.

<sup>8</sup> IBM Multi-Icon, p. 401, second paragraph

<sup>9</sup> *Id.*

<sup>10</sup> IBM Multi-Icon, p. 401, third paragraph.

Accordingly, claim 1 is believed to be patentable over the cited references for at least the above reasons. Independent claim 11 contains features that are similar to the features in claim 1 and, as such, claim 11 is believed to be patentable for at least the same reasons as claim 1.

Each of the dependent claims is believed to define patentable features of the invention. Each dependent claim partakes of the novelty of its corresponding independent claim, in light of the foregoing amendments, and, as such, has not been discussed specifically herein.

CONCLUSION

In view of the foregoing amendments and remarks, the rejections made in the Office Action should be withdrawn. If the Examiner believes, after this Reply, that the application is not yet in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, please charge any fee to Deposit Account No. 06-1050, referencing Attorney Docket No. 23769-0003001.

Respectfully submitted,

Date: April 27, 2009

/Peter J. Gordon/  
Peter J. Gordon  
Reg. No. 35,164

Fish & Richardson P.C.  
225 Franklin Street  
Boston, MA 02110  
Telephone: (617) 542-5070  
Facsimile: (877) 769-7945  
22180977.doc